

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

PATRICIA DE OLIVEIRA SOUZA LELIS  
BOLIN AND MARK C. BOLIN,

Plaintiffs,

v.

Case No. 1:21-cv-178-AJT-TCB

TARGET CORPORATION, D/B/A TARGET  
STORES INCORPORATED,

Defendant.

**PLAINTIFF PATRICIA DE OLIVEIRA SOUZA LELIS BOLIN'S  
WITNESS AND EXHIBIT LIST**

Plaintiff Patricia de Oliveira Sousa Lelis Bolin by and through counsel, hereby submit pursuant to the Court's scheduling order the following list of Witnesses and Exhibits that may be called or introduced at trial.

**WITNESSES**

1. Plaintiff Patricia De Oliveira Souza Lelis Bolin
2. Mark C. Bolin
3. Alexandro Gomes do Nascimento  
Rua Lucia Helena 120A  
Barrio Paqueta-Belo Horizonte-MG CEP 31.340-240  
+55 31 865-7829.
4. Any witness listed by Target.

**II. EXHIBITS**

1. Fairfax County General District Court Official record of proceedings in Docket No. GC29040401-00, including all exhibits.
2. Photographs of Plaintiff Ms. Bolin's injuries of February 26, 2019.

3. Documents showing requests to Target for video footage and Target's representative's responses thereto.
4. Video surveillance footage from February 26, 2019 provided to Plaintiff Ms. Bolin's counsel by Target.
5. Medical records and bills of Plaintiff.
6. Documents regarding the financial impact of Target's actions related to Plaintiff and the events of February 26, 2019.
7. Any and all exhibits identified by Target in its Exhibit List.

Plaintiff reserves the right to supplement and/or alter the Witness List and Exhibit List in light of the fact that discovery has not yet been completed, and is scheduled to close on August 31, 2021. does not waive any privilege or any objection as to the confidentiality, admissibility, or use of any information or any Exhibits in this action, nor its right to call additional witnesses or introduce additional documents to support the Bolin's defenses, as well as for impeachment or rebuttal.

PATRICIA DE OLIVEIRA SOUZA  
LELIS

By Counsel

/s/ Fern P. O'Brian  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was emailed this 19th day of August, 2021  
to:

Danielle D. Giroux (VSB No. 45401)  
Alexandra J. Sipes (VSB No. 90175)  
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/s/ Fern P. O'Brian

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Fern P. O'Brian